

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

STREAM TV NETWORKS, INC., *et al.*,

Debtors.<sup>1</sup>

STREAM TV NETWORKS, INC. and  
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

SHADRON L. STASTNEY, SLS HOLDINGS VI, LLC, HAWK INVESTMENT HOLDINGS LIMITED, ARTHUR LEONARD ROBERT “BOB” MORTON, SEECUBIC, INC., ALASTAIR CRAWFORD, KRZYSZTOF KABACINSKI, KEVIN GOLLOP, ASAFA GOLA, JOHN DOE(S),

Defendants.

Chapter 11

Case No. 23-10763 (MDC)

Adv. Case No. 23-00057 (MDC)

**HAWK INVESTMENT HOLDINGS LTD.’S JOINDER TO  
SEECUBIC, INC.’S MEMORANDUM OF LAW IN OPPOSITION  
TO DEBTORS’ MOTION FOR A TEMPORARY RESTRAINING  
ORDER, PRELIMINARY INJUNCTION, AND PERMANENT INJUNCTION**

Defendant Hawk Investment Holdings Ltd. (“Hawk”), through its undersigned counsel, hereby files this joinder to *SeeCubic, Inc.’s Memorandum of Law in Opposition to Debtors’ Motion for a Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction* (the “Opposition”),<sup>2</sup> objecting to the *Motion for a Temporary Restraining Order, Preliminary*

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<sup>1</sup> The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Opposition.

*Injunction, and Permanent Injunction* [AP ECF No. 30] (the “TRO Motion”). In support thereof, Hawk avers:

**JOINDER**

1. By this Joinder, Hawk hereby incorporates and joins all allegations and arguments included in the Opposition herein and requests the Court deny the relief requested in the TRO Motion in its entirety.

2. The TRO Motion represents nothing but another ploy by the Debtors to confuse the record, obfuscate the true material issues, and delay any potential reckoning, by seeking to delay the Court in ruling on the currently pending motions in the Debtors’ main bankruptcy case. The Debtors’ entire reason for pursuing these cases has been to distract from the true issues in controversy and attempt to frustrate Hawk’s (and the other Secured Creditors’) interests at every step. The TRO Motion represents just one more chapter in the same book, and the Court should not allow them to continue employing these tactics.

3. Nothing herein shall be construed as a waiver of any defense or claim Hawk may have with respect to the Complaint, including, but not limited to, any defense to the form, type, and procedure related to service of process. Hawk reserves all rights with respect to any answer, response, motion, or claim it may make in response to the Complaint, including with respect to service of process and personal jurisdiction.

WHEREFORE, Hawk respectfully requests this Honorable Court deny the Debtors' requested relief in the TRO Motion.

Dated: October 5, 2023

**K&L GATES LLP**

/s/ Steven L. Caponi

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**CERTIFICATE OF SERVICE**

I, Steven L. Caponi, certify that on October 5, 2023 I caused a copy of the forgoing *Hawk Investment Holdings Ltd.'s Joinder to SeeCubic, Inc.'s Memorandum of Law in Opposition to Debtors' Motion for a Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction* to be served on those persons receiving notice through CM/ECF.

/s/ Steven L. Caponi  
Steven L. Caponi (No. 91881)